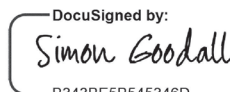


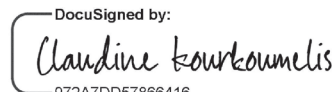
**DECLARATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the statements contained in Paragraphs 9-21, 34-47, 58, and 61-82 of the Verified Complaint related to Plaintiff Groupon, Inc. are true and correct to the best of my knowledge and belief.

DocuSigned by:  
  
B343BE5B545346D...  
Simon Goodall  
Chief Revenue Officer  
Groupon, Inc.


**DECLARATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the statements contained in Paragraphs 22-27, 30, 33, 48-57, and 60 of the Verified Complaint related to Plaintiff Groupon, Inc. are true and correct to the best of my knowledge and belief.

DocuSigned by:  
  
972A7DD57866416...  
\_\_\_\_\_  
Claudine Kourkouvelis  
Chief People Officer  
Groupon, Inc.

**DECLARATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the statements contained in Paragraphs 28-29 of the Verified Complaint related to Plaintiff Groupon, Inc. are true and correct to the best of my knowledge and belief.

DocuSigned by:  
  
E07EF67A766E4A7...  
Stephen Garvey  
Senior Human Resources  
Information Systems Analyst  
Groupon, Inc.

**DECLARATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the statements contained in Paragraphs 31-32 of the Verified Complaint related to Plaintiff Groupon, Inc. are true and correct to the best of my knowledge and belief.

DocuSigned by:  
  
E941AD4C29F740F....  
Doug Bach  
Global Head of Compensation &  
Benefits  
Groupon, Inc.